

Application No.: 09/715,176
Filed: November 20, 2000
TC Art Unit: 3621
Confirmation No.: 6429

REMARKS

The foregoing Amendment is filed in response to the Office Action dated January 11, 2008. Reconsideration is respectfully requested.

The status of the claims is as follows.

Claims 1-14, 24, and 43-52 are currently pending.

Claims 1-14, 24, and 43-52 stand rejected.

Claims 1, 4, 9, 24, 43, 50, and 52 have been amended.

The Examiner has rejected claims 1-14, 24, and 43-52 under 35 U.S.C. 103(a) as being unpatentable over Camenisch *et al.* ("An Efficient Fair Payment System") in view of Stolfo *et al.* (USP Pub. 2004/0002903). The Applicants respectfully submit, however, that base claims 1, 9, 24, 43, and 52, as amended, and the claims depending therefrom, recite non-obvious subject matter that distinguishes over the art of record, and therefore the rejections of claims 1-14, 24, and 43-52 under 35 U.S.C. 103 should be withdrawn.

For example, amended base claim 1 recites a method of purchasing a product while maintaining anonymity of a buyer that includes receiving, by a trusted third party from the buyer, an indicator of one of a plurality of different payment methods, and assigning an anonymous identifier to the indicator of the

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respective payment method. Next, the trusted third party populates a digital repository with data associated with the buyer, including a buyer identification indicator, the indicator of the respective payment method, and the anonymous identifier. The trusted third party then receives, from the buyer, the anonymous identifier as an anonymous payment method for a product the buyer is purchasing. The product has an associated total sale price. Next, the trusted third party receives, from a seller, the total sale price for payment approval of the product the buyer is purchasing. As recited in amended claim 1, the respective payment method for purchasing the product is unknown to the seller. The trusted third party then queries the digital repository to determine the respective payment method from the received anonymous identifier. As further recited in amended claim 1, prior to querying the digital repository, the respective payment method for purchasing the product is unknown to the trusted third party. Next, the trusted third party requests payment approval from a payment partner by providing the payment partner a description of the respective payment method, as determined in the querying step, and the total sale price. The payment approval is then provided to the seller.

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The official action indicates that the Camenisch reference discloses receiving, by a trusted third party from a buyer, an indicator of a payment method, and assigning an anonymous identifier to the indicator that corresponds to the payment method. The official action further indicates that the Stolfo reference discloses populating, by the trusted third party, a digital repository with data that is associated with the buyer, receiving, by the trusted third party from the buyer, the anonymous identifier as an anonymous payment method for a product the buyer is purchasing, receiving, by the trusted third party from a seller, a total sale price for payment approval of the product the buyer is purchasing, querying, by the trusted third party, the digital repository to determine the payment method from the received anonymous identifier, requesting, by the trusted third party, payment approval from a payment partner by providing the payment partner a description of the payment method and the total sale price, and providing payment approval to the seller.

Specifically, with reference to the step of querying the digital repository to determine the payment method from the anonymous identifier, the official action indicates that the Stolfo reference discloses a proxy system that can pass a user's proxy identifier to a bank to allow that bank to identify the user

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as a bank customer and to subsequently access the customer's account. As indicated in the official action, the user's proxy identifier may be considered as a distinct plastic credit card. The official action further indicates that when the bank receives the user's proxy identifier, it is inherently aware of what type of payment method the customer is implementing, and can therefore identify the customer and access the customer's account for processing a transaction.

The Applicants respectfully point out, however, that prior to querying the digital repository to determine the payment method from the anonymous identifier, the respective payment method for purchasing a product is unknown to the trusted third party, as recited in amended base claim 1. In fact, the trusted third party performs the step of querying the digital repository in order to determine the respective payment method, which was unknown to the trusted third party prior to performing the querying step. Accordingly, unlike the bank discussed in the Stolfo reference, the trusted third party of amended claim 1 is not aware, inherently or otherwise, of what type of payment method a customer is implementing before querying the digital repository. The Applicants further point out that the respective payment method

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for purchasing the product is unknown to the seller, as recited in amended claim 1.

As recited in amended base claim 1, the claimed method of purchasing a product while maintaining anonymity of a buyer includes receiving, by a trusted third party from the buyer, an indicator of one of a plurality of different payment methods, assigning an anonymous identifier to the indicator of the respective payment method, and determining, from the anonymous identifier, the respective payment method by querying a digital repository populated with data associated with the buyer. As described in the present application, the plurality of different payment methods can include an authorization, a payment, a credit, or any other suitable payment method (see page 17, lines 7-9, of the application). The claimed invention therefore allows a buyer to employ one of a plurality of different payment methods for purchasing a product, while concealing the buyer's payment method from the seller and maintaining complete privacy.

In this way, a buyer's use of many varied forms of payment becomes transparent to a seller. Further, as a trusted third party is enabled to implement new payment vehicles, the seller will also become enabled to accept these new vehicles for transactions with the trusted third party, without the need for

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costly implementation themselves. Advantageously, by hiding the buyer's payment methods from the seller, the claimed invention allows for the implementation of micropayments, while maintaining the complete privacy of the buyer. The claimed invention also allows for buyers to set up prefunded cash accounts, which can be used while maintaining complete privacy (see page 7, lines 9-17, of the application). Such advantages are neither taught nor suggested in the Camenisch and Stolfo references.

Because neither the Camenisch reference nor the Stolfo reference discloses a method of purchasing a product while maintaining anonymity of a buyer as recited in amended base claim 1, in which a payment method of the buyer remains unknown until a trusted third party queries, using an anonymous identifier, a digital repository populated with data associated with the buyer to determine the payment method, the Applicants respectfully submit that the combined teachings of the Camenisch and Stolfo references would not suggest to one of ordinary skill in this art at the time of the invention the subject matter of amended claim 1 and the claims depending therefrom. For at least the reasons discussed above with reference to amended claim 1, the Applicants further submit that the combined teachings of the Camenisch and Stolfo references would not suggest to one skilled in this art at

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the time of the invention the subject matter of amended base claims 9, 24, 43, and 52 and the claims depending therefrom. Accordingly, it is respectfully submitted that the rejections of claims 1-14, 24, and 43-52 under 35 U.S.C. 103 should be withdrawn.

In view of the foregoing, it is respectfully submitted that the present application is in a condition for allowance. Early and favorable action is respectfully requested.

The Examiner is encouraged to telephone the undersigned Attorney to discuss any matter that would expedite allowance of the present application.

Respectfully submitted,

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